

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KEITH ROSE,)	
)	
Plaintiff,)	No. 4:22-CV-00099 JMB
)	
v.)	
)	
ROBERT SCHULTE,)	
)	
Defendant.)	

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff respectfully requests a 60-day extension of the joinder and amendments deadline from August 15, 2022 to October 14, 2022. In support, Plaintiff states:

1. Under the Case Management Order in this case, the deadline for joinder and amendments to the pleadings is August 15, 2022. (*See* ECF No. 20.)
2. On July 6 and July 12, 2022, counsel for Plaintiff contacted then-counsel for Defendant to schedule Defendant's deposition for July or August 2022.
3. Later on July 12, 2022, current counsel for Defendant substituted his appearance for previous counsel.
4. Current defense counsel is a Commander in the Army Reserves and has training requirements that prevent him from being available to defend Defendant's deposition during the period proposed by Plaintiff.
5. Defense counsel has suggested that a September deposition would be acceptable.
6. Plaintiff believes a deposition of Defendant Robert Schulte is required for Plaintiff to assess whether joinder or amendments may be necessary.
7. As such, Plaintiff respectfully requests a 60-day extension of the joinder and

amendments deadline from August 15, 2022 to October 14, 2022.

8. The proposed extension of time will not affect any other pending deadlines in the case, will not prejudice Defendant, and is not made for any improper purpose.
9. Defendant consents to this request.

WHEREFORE Plaintiff requests an extension of the joinder and amendments deadline until October 14, 2022.

Respectfully submitted,

/s/ Jessie Steffan

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